

IN THE UNITED STATES DISTRICT COURT  
FOR THE STATES OF DELAWARE

STEPHANIE LYNN FORD PRO-SE

Plaintiff,

V.

CHRISTIANA CARE HEALTH SYSTEMS,  
RICHARD BURTON, AND CLARA CLARK

DEFENDANTS

**Plaintiff's Response And Disagreement With The Defendants Response To Request  
NO. 7 COURTS JUNE 29,2007 ORDER, FOR THE DEFENDANTS TO PLEASE  
PRODUCE THE REASON THE PLAINTIFF WAS DENIED 29 JOBS AT  
CHRISTIANA CARE HEALTH SYSTEMS.**

The Plaintiff Stephanie Lynn Ford, resides at 19 Albany Ave. Newcastle, Delaware 19720 .

The Defendants, Christiana Care Health Systems, Richard Burton, and Clara Clark resides at, or its business is located at Christiana Care Health Systems 200 Hygeia Drive Newark, Delaware 19713

**I the Plaintiff, Stephanie Lynn Ford Pro-Se, Hereby Respectfully request this Honorable Court enter an order, by granting Plaintiff's complaint and summary judgment against the Defendants. Concerning the Relevant Information as to Why the Plaintiff was refused 29 jobs at Christiana Care Health Systems. I the Plaintiff have worked for Christiana Care Hospital for 17 years. I have applied for 29 jobs not 27 jobs as the defendant has stated. The Plaintiff have applied for 29 jobs from May 18, 2004 To June 2, 2004, Not May 21, 2004 as the defendants have stated. I the Plaintiff have enclosed a complete list of the jobs. The defendants reasons that the Plaintiff was not selected for any of those positions is to vague and to broad.**

CIVIL ACTION No. 06-301

(MPT)

JURY TRIAL

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 AUG 13 PM 12:01

*Because, the defendants did not follow the Hospital employment Policies and Procedures. There is a normal standard employment procedure in place, when an employee applies for a position. The 5 most qualified candidates are selected and interviewed for that particular position and management selects the best candidate, after, interviewing process has taken place. I the Plaintiff was not selected nor interviewed for nearly none of the 29 jobs. Including the #10 Health Records Clerk Position. Which, I the Plaintiff had already worked in this particular job prior for 9 years. The Defendants response outcome was that "quote Position awarded to candidate more qualified than Plaintiff end quote" Who, would be a more qualified person with 9 years experience and qualifications than myself. I was not considered for the position or interviewed. Who, would be the best candidate that is familiar with Health Records Charting Systems and able to process Charts effectively and efficiently in a timely manner, than myself. I the Plaintiff am qualified to perform the Health Records Position and all the other positions that, I have applied for at Christiana Care Health Systems*

*I the Plaintiff, Stephanie Lynn Ford was Refused all 29 Jobs at Christiana Care Health Systems Without Due Process Of The Law, And With Respect To The Honorable Judge Kent A. Jordan who prematurely Dismissed The Prior Motions without considering these relevant facts.*

*Sincerely,*

*Stephanie L. Ford*  
Stephanie Lynn Ford

Week \_\_\_\_\_ of \_\_\_\_\_

INTENSIVE JOB SEARCH LOG

I provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
2/1/04	Team Coordinator / Mrs. Burton	908 recruiter (302) 428-5746	Christiana Care Hospital	Completed application
2/1/04	Unit Clerk VI	(302) 428-5746	Christiana Care Hospital	Completed application
5/21/04	Patient Information Rep.	(302) 428-5746	Christiana Care Hospital	Completed application
12/1/04	Patient Care Technician	(302) 428-5746	Christiana Care Hospital	Completed application
12/1/04	Sale Receiving Clerk	(302) 428-5746	Christiana Care Hospital	Completed application

Arch results verified by: \_\_\_\_\_

Date: \_\_\_\_\_

Additional Comments:

At the

Week \_\_\_\_\_ of \_\_\_\_\_

INTENSIVE JOB SEARCH LOG

Name Stephanie Ford  
 Dates 5/24/04 to 5/28/04

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal, newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone // Fax #	Company/Contact Name	Results
5/28/04	Clerk	(302) 428-5746	Christiana Care Hospital / Mr. Burton	Completed Application
5/28/04	My Job Recruiters	Mr. Rick Burton (302) 428-5746		
5/28/04	Unit Clerk	(302) 428-5746	Christiana Care Hospital / Mr. Burton	Completed Application
5/28/04	Clerk	(302) 428-5746	Christiana Care Hospital / Mr. Burton	Completed Application
5/28/04	Duplicator Operator	(302) 428-5746	Christiana Care Hospital / Mr. Burton	Completed Application
5/28/04	Health Records Clerk	(302) 428-5746	Christiana Care Hospital / Mr. Burton	Completed Application

Search results verified by: \_\_\_\_\_

Date: \_\_\_\_\_

Additional Comments:

searching for

name Stephanie Ford  
 dates 5/31/04 to 6/4/04

WEEK \_\_\_\_\_

# INTENSIVE JOB SEARCH LOG

case provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal, fax, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
6/4/04	OR Tech	(302) 428-5746	Christiana Care Hospital	Mr. Burton / Complete Application
6/4/04	Admin, Asst.	(302) 428-5746	Christiana Care Hospital	Mr. Burton / Complete Application
6/4/04	Clerk II	(302) 428-5746	Christiana Care Hospital	Mr. Burton / Complete Application
6/4/04	Clerk II	(302) 428-5746	Christiana Care Hospital	Mr. Burton / Complete Application
6/4/04	Career Development	(302) 428-5746	Christiana Care Hospital	Mr. Burton / Complete Application

Search results verified by:

Date:

Additional Comments:

Search Log.doc

Name Stephanie Ford  
 Dates 6/7/04 to 6/11/04

# INTENSIVE JOB SEARCH LOG

please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
6/11/04	Home Health Assistant	(302) 428-5746	Christiana Care Hospital	Completed application
Notes	interview - 6/6/04 clerk position (Christiana Care Hospital) / SC 5 <sup>th</sup> floor.			
6/11/04	"Perle"	(302) 428-5746	Christiana Care Hospital	Completed application
Notes				
6/11/04	Consignment Assistant	(302) 428-5746	Christiana Care Hospital	Completed application
Notes				
6/11/04	Service Assistant	(302) 428-5746	Christiana Care Hospital	Completed app
Notes				
6/11/04	Scheduler	(302) 428-5746	Christiana Care Hospital	Completed app.
Notes				
6/12/04	Correctional Officer	(302) 739-5458	The Employee Relation Center	Completed Application
Notes				

**ol Search results verified by:**

all Delaware Tech College

**Additional Comments:**

3761

Have appointment phlebotomy 6/15/04  
Information Session at Delaware Sea  
Commons  
August 5, 2004

Dr. Maria O. Knapp, M.D., F.R.C.S.

10:00 To 12:00

Week \_\_\_\_ of 4

Name Stephanie Ford  
 Dates 6/14/04 to 6/18/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal only, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
6/15/04	Medical Records Clerk	(302) 428-5746	A.I. Dupont Hospital	Completed Application
6/15/04	Laundry aide / Environmental Services		St. Francis Hospital	Completed Application
6/18/04	Home Health Training Program	(302) 428-5746	Christian Care Hospital	Completed Application
6/18/04	Assistant Program	(302) 428-5746	Christian Care Hospital	Completed Application
6/18/04	Security Officer	(302) 428-5746	Christian Care Hospital	Completed Application

Job Search results verified by : \_\_\_\_\_ Date: \_\_\_\_\_

Additional Comments:

nc Stephanie Ford  
 CS 6/21/04 to 6/25/04

# INTENSIVE JOB SEARCH LOG

I provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal  
copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
6/24/04	Residency Program Assistant		Christiana Care Hospital	Completed application
6/24/04	Collection Specialist		Home Health / Christiana Care Hospital	Completed application
6/24/04	Operations Support Specialist		Delaware Psychiatric Center	Completed application
6/25/04	Home Health Assistant		Christiana Care Hospital	Completed application
6/25/04	Exercise Technician		Christiana Care Hospital	Completed application
Received phone call - Mr. John Judy 428-5768 about Home Health Position 7/1/04 Christiana Care Hospital				
arch results verified by :		Date:		

Additional Comments:



Week \_\_\_\_ of 4

Name Stephanie FordDates 7/5/04 to 7/9/04INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

Date	Job Title	Telephone # / Fax #	Company/Contact Name	Results
7/7/04	Clerk	604 395-0400	Stratus Services Group	Completed application
7/7/04	Security Officer		Bennett Security Services	Completed application
7/8/04	Security Officer		Allied Security	Completed application
7/8/04	Westcoast Temp Services - Security Officer			

b Search results verified by :

Date:

Additional Comments:

# CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES  
THAT COPIES OF THE FOREGOING  
WERE CAUSED TO BE SERVED  
THIS 13, DAY AUGUST 2007  
UPON THE FOLLOWING IN THE  
MANNER INDICATED:

U.S. CERTIFIED MAIL

MORGAN, LEWIS & BOCKIUS LLP

MORRIS JAMES LLP

DAVID H. WILLIAMS (#616)

JAME H. McMackin, III (#4284)

THOMAS S. BLOOM

1701 MARKET STREET

PHILADELPHIA, PA 19103